# EXHIBIT 6

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.
TATUNG CO.;
TATUNG COMPANY OF AMERICA, INC.; AND VIEWSONIC CORPORATION

Defendants.

**CIVIL ACTION NO. 04-343** 

### DEFENDANT VIEWSONIC CORPORATION'S AMENDED SUPPLEMENTAL RESPONSES TO PLAINTIFF'S SECOND SET OF INTERROGATORIES

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant ViewSonic Corporation ("ViewSonic") submits its Amended Supplemental Responses to Plaintiff LG.Philips LCD Co. Ltd.'s ("LPL") Second Set of Interrogatories ("Interrogatories").

#### **General Objections**

ViewSonic objects to each and every interrogatory as set forth below. These objections are incorporated into every response and are set forth here to avoid the duplication and repetition of restating them for each interrogatory. These general objections may specifically be referred to in response to an interrogatory for clarity; however, the failure to specifically repeat a general objection should not be construed as a waiver of the objection.

1. ViewSonic objects to the Definitions and/or the Interrogatories to the extent they purport to impose obligations on ViewSonic greater than those imposed by operation of law.

- 2. ViewSonic objects to each of the Interrogatories to the extent that each is so vague, ambiguous, overlybroad and unduly burdensome so as to render it impossible to respond in any reasonable manner or amount of time.
- 3. ViewSonic objects to each of the Interrogatories to the extent they seek information protected by the attorney-client privilege, work product doctrine, or other applicable privileges or immunities from discovery and such information will be withheld.
- 4. Where ViewSonic agrees to provide information in compliance with LPL's Interrogatories, ViewSonic's agreement to do so does not reflect ViewSonic's concurrence in any factual assertions contained therein.
- 5. ViewSonic has not fully completed its investigation of the facts relating to this case, its discovery and its preparation for trial. All responses and objections contained herein are based only upon such information and such documents which are presently available to and specifically known to ViewSonic as of the date hereof through the exercise of reasonable diligence. It is anticipated that further discovery, independent investigation, legal research and analysis may supply additional facts and add meaning to known facts, as well as establish entirely new factual conclusions and legal conclusions, all of which may lead to substantial additions to, changes in and variations from the responses set forth herein. The foregoing objections and following responses are made without prejudice to ViewSonic's right to provide any subsequently discovered information. Accordingly, without assuming any obligation to do so, and without waiving the objections asserted herein, ViewSonic reserves the right to amend and/or supplement these responses as and when additional facts are discovered or ascertained. Furthermore, ViewSonic's objections to Plaintiff's Interrogatories do not necessarily reflect the existence of requested information.

6. Each and all of these General Objections are hereinafter incorporated by reference in response to each and every interrogatory.

#### **SPECIFIC OBJECTIONS AND RESPONSES**

#### **INTERROGATORY NO. 1:**

Identify each person who prepared or otherwise assisted in the preparation of your responses to these interrogatories.

#### **RESPONSE TO INTERROGATORY NO. 1:**

ViewSonic incorporates its general objections herein by reference. ViewSonic further objects to this Interrogatory to the extent it seeks information that is protected by the attorneyclient privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiving the foregoing objections, ViewSonic responds as follows: Scott Miller and Tracy Roman, Bingham McCutchen, 355 S. Grand Avenue, Suite 4400 Los Angeles CA 90071.

#### **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:**

ViewSonic incorporates its general objections herein by reference. ViewSonic further objects to this Interrogatory to the extent it seeks information that is protected by the attorneyclient privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiving the foregoing objections, ViewSonic supplements its response as follows: Bonnie Uphold, Esq., ViewSonic Corporation, 381 Brea Canyon Road, Walnut, CA 91789; Scott Miller, Connelly Bove Lodge & Hutz LLP, 355 S. Grand Avenue,

Suite 3150, Los Angeles, CA 90071; and Tracy Roman, Bingham McCutchen, 355 S. Grand Avenue, Suite 4400 Los Angeles CA 90071.

#### AMENDED SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:

ViewSonic incorporates its general objections herein by reference. ViewSonic further objects to this Interrogatory to the extent it seeks information that is protected by the attorneyclient privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiving the foregoing objections, ViewSonic supplements its response as follows: Bonnie Uphold, Esq., ViewSonic Corporation, 381 Brea Canyon Road, Walnut, CA 91789; Scott Miller, Connelly Bove Lodge & Hutz LLP, 355 S. Grand Avenue, Suite 3150, Los Angeles, CA 90071; and Tracy Roman, Raskin Peter Rubin & Simon LLP, 1801 Century Park East, Suite 2300, Los Angeles, CA 90067.

#### **INTERROGATORY NO. 2:**

Identify each type of visual display product (such as the ViewSonic VX900 monitor) manufactured, shipped, imported, sold, and/or offered for sale, by or for you, since January 1, 2002, and specify which products have been marketed or sold under a trademark or brand name that belongs to ViewSonic Corporation or its affiliated entities.

#### **RESPONSE TO INTERROGATORY NO. 2:**

ViewSonic incorporates its general objections herein by reference. ViewSonic objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, oppressive, vague and ambiguous, including as to the phrase "type of visual display product." ViewSonic also objects on the grounds that this Interrogatory seeks information which is not relevant to the claims or

486396 1 4 defenses of this lawsuit, and which is not reasonably calculated to lead to the discovery of admissible evidence, including that it is not limited to the United States.

Subject to and without waiving the foregoing objections, ViewSonic responds as follows: Based upon information and belief, the following ViewSonic LCD computer monitors have been shipped, imported, sold, or offered for sale in the United States since January 1, 2002:

Q7B	VA721	VE170	VG150B	VG500B	VG910S	VP211B	VX2000
Q9B	VA902B	VE170B	VG150M	VG510B	VG920	VP2000	VX500
Q150	VA912B	VE170M	VG150MB	VG700	VG2021M	VP2000S	VX500+-1
Q170	VA800	VE170MB	VG151	VG700B	VP150M	VP2030B	VX500T
Q170B	VA930	VE175	VG151B	VG710B	VP171B	VP2130B	VX700
Q190MB	VA1912W	VE175B	VG170M	VG710S	VP171S	VP2290B	VX710
VA500	VA1912WB	VE180	VG171	VG720	VP181B	VP230MB	VX715
VA520	VA2012WB	VE500	VG171B	VG750	VP181S	VP231WB	VX724
VA521	VE150	VE510+-1	VG175	VG800	VP191B	VP720B	VX800
VA550	VE150B	VE510B	VG181	VG800B	VP191S	VP730B	VX900
VA700	VE150M	VE700	VG181B	VG810B	VP201B	VP920B	VX910
VA702B	VE150MB	VE710B/S	VG191	VG900	VP201M	VP930B	VX924
VA712B	VE155	VE800	VG191B	VG900B	VP201MB	VPD150	
VA720	VE155B	VG150	VG500	VG910B	VP201S	VT550	

#### **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:**

ViewSonic incorporates its general objections herein by reference. ViewSonic objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, oppressive, vague and ambiguous, including as to the phrase "type of visual display product." ViewSonic also objects on the grounds that this Interrogatory seeks information which is not relevant to the claims or defenses of this lawsuit, and which is not reasonably calculated to lead to the discovery of admissible evidence, including that it is not limited to the United States.

Subject to and without waiving the foregoing objections, ViewSonic supplements its response as follows: ViewSonic is informed and believes that the following LCD products have been marketed or sold under a trademark or brand name that belongs to ViewSonic Corporation or its affiliated entities since January 1, 2002:

L700	Q170	VA903M	VE510B	VG180M	VG910B	VP201B	VX500
N1300	Q170B	VA905	VE510S	VG181	VG910S	VP201M	VX500+-1
N1700W	Q171B	VA912	VE700	VG181B	VG920	VP201MB	VX500T
N1750W	Q190MB	VA912B	VE702M	VG191	VG921M	VP201S	VX510
N2000	VA500	VA913B	VE710B	VG191B	VG930M	VP211B	VX700
N2010	VA501B	VA915	VE710S	VG500	VG1921WM	VP230MB	VX710
N2011	VA503B	VA930	VE720M	VG500B	VG1930WM	VP231WB	VX712
N2050W	VA503M	VA1912W	VE720MB	VG510B	WG2020	VP720	VX715
N2700W	VA520	VA1912WB	VE800	VG510S	VG2021M	VP720B	VX724
N2750W	VA521	VA2012W	VE902M	VG511S	VG2021WM	VP730	VX730
N2751W	VA550	VA2012WB	VE910	VG512S	VG2030WM	VP730B	VX750
N3000W	VA700	VE150	VE910B	VG700	VG2230WM	VP912B	VX800
N3020W	VA702	VE150B	VE920M	VG700B	VP140	VP912S	VX900
N3200W	VA702B	VE150M	VE920MB	VG710B	VP150	VP920	VX910
N3208W	VA703B	VE150MB	VE1920WM	VG710S	VP150M	VP920B	VX912
N3250W	VA703M	VE155	VE1920WMB	VG712B	VP151	VP930B	VX922
N3251W	VA712	VE155B	VG150	VG712S	VP171	VP2000S	VX924
N3252W	VA712B	VE155S	VG150B	VG720	VP171B	VP2030B	VX1935WM
N4000WP	VA720	VE170	VG150M	VG721M	VP171S	VP2130B	VX2000
N4050W	VA721	VE170B	VG150MB	VG730M	VP180M	VP2290B	VX2022W
N4200W	VA721B	VE170M	VG151	VG750	VP181	VP2330WB	VX2025W
Q5B	VA730M	VE170MB	VG151B	VG800	VP181B	VPA145	VX2025WM
Q7	VA800	VE175	VG170M	VG800B	VP181S	VPA150	
Q7B	VA850	VE175B	VG170MB	VG810B	VP191	VPD150	
Q9B	VA902	VE180	VG171	VG810S	VP191B	VT550	
Q19WB	VA902B	VE500	VG171B	VG900	VP191S	VTA700	
Q150	VA903B	VE510+-1	VG175	VG900B	VP201	VTA900	

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Once LPL identifies products it accuses of infringement, ViewSonic will undertake to locate any corresponding products sold outside the United States. ViewSonic is attempting to compile a list of products only sold outside the United States.

# AMENDED SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:

ViewSonic incorporates its general objections herein by reference. ViewSonic objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, oppressive, vague and ambiguous, including as to the phrase "type of visual display product." ViewSonic also objects on the grounds that this Interrogatory seeks information which is not relevant to the claims or defenses of this lawsuit, and which is not reasonably calculated to lead to the discovery of admissible evidence, including that it is not limited to the United States.

Subject to and without waiving the foregoing objections, ViewSonic supplements its response as follows: ViewSonic is informed and believes that the following LCD products have been marketed or sold under a trademark or brand name that belongs to ViewSonic Corporation or its affiliated entities since December 1, 2002:

AIRPANEL 100	Q170	VA902B	VE910	VG710S	VP2000S	VPW450HD
APV110	Q170B	VA903B	VE910B	VG712B	VP201	VPW500
APV150	Q171B	VA903M	VE920M	VG712S	VP201B	VPW505
APV210	Q190MB	VA905	VE920MB	VG720	VP201B-H	VPW5500
ASV205	Q19WB	VA912	VG150	VG721M	VP201M	VT550
ASV210	Q5B	VA912B	VG150B	VG730M	VP201MB	VTA700
ASV212	Q7	VA913B	VG150M	VG750	VP201S	VTA900
L700	Q7B	VA915	VG150MB	VG800	VP2030B	VX1935WM
N1300	Q9B	VA930	VG151	VG800B	VP2030B-H	VX1945WM
N1500TV	TPCV1100	VE150	VG151B	VG810B	VP211B	VX2000
N1700W	TPCV1250	VE150B	VG170M	VG810S	VP211B-H	VX2022W
N1750W	VA1912W	VE150M	VG170MB	VG900	VP2130B	VX2025W
N1800TV	VA1912WB	VE150MB	VG171	VG900B	VP2130B-H	VX2025WM
N2000	VA1930WM	VE155	VG171B	VG910B	VP2290B	VX2035WM
N2010	VA2012W	VE155B	VG175	VG910S	VP230MB	VX2235WM
N2011	VA2012WB	VE155S	VG180	VG920	VP231WB	VX2245WM
N2050W	VA500	VE170	VG180M	VG921M	VP2330WB	VX500
N2060W	VA501B	VE170B	VG181	VG930M	VP720	VX500+-1
N2700W	VA503B	VE170M	VG181B	VIEWPAD 100	VP720B	VX500T
N2750W	VA503M	VE170MB	VG191	VIEWPAD 1000	VP730	VX510
N2751W	VA520	VE175	VG191B	VP140	VP730B	VX700
N2752W	VA521	VE175B	VG1921WM	VP150	VP730B-H	VX710
N3000W	VA550	VE180	VG1930WM	VP150M	VP912B	VX712
N3020W	VA700	VE1920WM	VG2021M	VP151	VP912S	VX715
N3200W	VA702	VE1920WMB	VG2021WM	VP171	VP920	VX724
N3208W	VA702B	VE500	VG2030M	VP171B	VP920B	VX730
N3250W	VA703B	VE510+-1	VG2030WM	VP171B-H	VP930B	VX750
N3251W	VA703M	VE510B	VG2230WM	VP171S	VP930B-H	VX800
N3252W	VA712	VE510S	VG500	VP180M	VPA138	VX900
N3260W	VA712B	VE700	VG500B	VP181	VPA145	VX910
N3751w	VA720	VE702M	VG510B	VP181B	VPA150	VX912
N3760W	VA721	VE710B	VG510S	VP181B-H	VPD150	VX922
N4000WP	VA721B	VE710S	VG511S	VP181S	VPD180	VX924
N4050W	VA730M	VE720M	VG512S	VP191	VPW420	WG2020

N4060W	VA800	VE720MB	VG700	VP191B	VPW4200	
N4200W	VA850	VE800	VG700B	VP191B-H	VPW425	
Q150	VA902	VE902M	VG710B	VP191S	VPW4255	

#### **INTERROGATORY NO. 3:**

Identify each type of visual display product (such as the ViewSonic VX900 monitor) manufactured, shipped, imported, sold, and/or offered for sale, in or to the United States, by or for you, since January 1, 2002.

#### **RESPONSE TO INTERROGATORY NO. 3:**

ViewSonic incorporates its general objections herein by reference. ViewSonic objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, oppressive, vague and ambiguous, including as to the phrase "type of visual display product." ViewSonic also objects on the grounds that this Interrogatory seeks information which is not relevant to the claims or defenses of this lawsuit, and which is not reasonably calculated to lead to the discovery of admissible evidence, including that it is not limited to the United States.

Subject to and without waiving the foregoing objections, ViewSonic responds as follows: See Response to Interrogatory No. 2.

#### **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:**

ViewSonic incorporates its general objections herein by reference. ViewSonic objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, oppressive, vague and ambiguous, including as to the phrase "type of visual display product." ViewSonic also objects on the grounds that this Interrogatory seeks information which is not relevant to the claims or defenses of this lawsuit, and which is not reasonably calculated to lead to the discovery of admissible evidence, including that it is not limited to the United States.

Subject to and without waiving the foregoing objections, ViewSonic supplements its response as follows: The following LCD products have been marketed or sold in the United States under a trademark or brand name that belongs to ViewSonic Corporation or its affiliated entities since January 1, 2002:

L700	N4050W	VA800	VE500	VG181	VG910B	VP201S	VX500
N1300	N4060W	VA902B	VE510+-1	VG181B	VG910S	VP211B	VX500+-1
N1700W	N4200W	VA912B	VE510B	VG191	VG920	VP230MB	VX500T
N1750W	Q7B	VA930	VE510S	VG191B	VG2021M	VP231WB	VX510
N2000	Q9B	VA1912W	VE700	VG500	VP140	VP720B	VX700
N2010	Q150	VA2012WB	VE710B	VG500B	VP150	VP730B	VX710
N2011	Q170	VE150	VE710S	VG510B	VP150M	VP912B	VX715
N2050W	Q170B	VE150B	VE800	VG510S	VP151	VP920B	VX724
N2700W	Q190MB	VE150M	VE903	VG700	VP171	VP930B	VX800
N2750W	VA500	VE150MB	VE910B	VG700B	VP171B	VP2000S	VX900
N2751W	VA503B	VE155	VG150	VG710B	VP171S	VP2030B	VX910
N3000W	VA520	VE155B	VG150B	VG710S	VP180M	VP2130B	VX922
N3020W	VA521	VE155S	VG150M	VG720	VP181	VP2290B	VX924
N3200W	VA550	VE170	VG150MB	VG750	VP181B	VP2330WB	VX2000
N3250W	VA700	VE170B	VG151	VG800	VP181S	VPA145	VX2025WM
N3251W	VA702	VE170M	VG151B	VG800B	VP191B	VPA150	
N3252W	VA702B	VE170MB	VG170M	VG810B	VP191S	VPD150	
N3260W	VA712B	VE175	VG171	VG810S	VP201B	VT550	
N3760W	VA720	VE175B	VG171B	VG900	VP201M	VTA700	
N4000WP	VA721	VE180	VG175	VG900B	VP201MB	VTA900	

# **AMENDED SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:**

ViewSonic incorporates its general objections herein by reference. ViewSonic objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, oppressive, vague and ambiguous, including as to the phrase "type of visual display product." ViewSonic also objects on the grounds that this Interrogatory seeks information which is not relevant to the claims or defenses of this lawsuit, and which is not reasonably calculated to lead to the discovery of admissible evidence, including that it is not limited to the United States.

Subject to and without waiving the foregoing objections, ViewSonic supplements its response as follows: The following LCD products have been marketed or sold in the United

States under a trademark or brand name that belongs to ViewSonic Corporation or its affiliated entities since December 1, 2002:

AIRPANEL 100	N4050W	VA800	VG150B	VG721M	VP2000S	VPW4255
APV110	N4060W	VA902B	VG150M	VG730M	VP201B	VPW450HD
APV150	N4200W	VA903B	VG150MB	VG750	VP201B-H	VPW500
APV210	Q150	VA912B	VG151	VG800	VP201M	VPW505
ASV205	Q170	VA930	VG151B	VG800B	VP201MB	VPW5500
ASV210	Q170B	VE150	VG170M	VG810B	VP201S	VT550
ASV212	Q171B	VE150B	VG171	VG810S	VP2030B	VTA700
L700	Q190MB	VE150M	VG171B	VG900	VP2030B-H	VTA900
N1300	Q19WB	VE150MB	VG175	VG900B	VP211B	VX1935WM
N1500TV	Q7	VE155	VG180	VG910B	VP211B-H	VX1945WM
N1700W	Q7B	VE155B	VG181	VG910S	VP2130B	VX2000
N1750W	Q9B	VE155S	VG181B	VG920	VP2130B-H	VX2025WM
N1800TV	TPCV1100	VE170	VG191	VG930M	VP2290B	VX2035WM
N2000	TPCV1250	VE170B	VG191B	VIEWPAD 100	VP230MB	VX2235WM
N2010	VA1912W	VE170M	VG1930WM	VIEWPAD 1000	VP231WB	VX2245WM
N2011	VA1912WB	VE170MB	VG2021M	VP140	VP2330WB	VX500
N2050W	VA1930WM	VE175	VG2030M	VP150	VP720B	VX500+-1
N2060W	VA2012WB	VE175B	VG2030WM	VP150M	VP730B	VX500T
N2700W	VA500	VE180	VG2230WM	VP151	VP730B-H	VX510
N2750W	VA503B	VE500	VG500	VP171	VP912B	VX700
N2751W	VA520	VE510+-1	VG500B	VP171B	VP920B	VX710
N3000W	VA521	VE510B	VG510B	VP171B-H	VP930B	VX715
N3020W	VA550	VE510S	VG510S	VP171S	VP930B-H	VX724
N3200W	VA700	VE700	VG511S	VP180M	VPA138	VX750
N3250W	VA702	VE710B	VG512S	VP181	VPA145	VX800
N3251W	VA702B	VE710S	VG700	VP181B	VPA150	VX900
N3252W	VA703B	VE800	VG700B	VP181B-H	VPD150	VX910
N3260W	VA712B	VE902M	VG710B	VP181S	VPD180	VX912
N3751w	VA720	VE910	VG710S	VP191B	VPW420	VX922
N3760W	VA721	VE910B	VG712B	VP191B-H	VPW4200	VX924
N4000WP	VA730M	VG150	VG720	VP191S	VPW425	